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10 Attorney for BRYAN JAMES GALLAGHER

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 BRYAN JAMES GALLAGHER.

17 Defendant.

18 Case No. 2:15-cr-028-JAD-PAL

19 **UNOPPOSED MOTION TO MODIFY**
20 **A CONDITION OF PRETRIAL**
21 **RELEASE**

22 Defendant, BRYAN GALLAGHER, by and through his attorney of record, Monique Kirtley, Assistant Federal Public Defender, hereby files this Unopposed Motion to Modify a Condition of Pretrial Release to allow for travel outside of the United States.

23 1. On May 10, 2016, Mr. Gallagher filed a motion to modify his pretrial release
24 condition which prohibited his travel outside of the United States. Specifically, Mr. Gallagher
25 requested permission to travel to Puerto-Peñasco, Mexico from June 30, 2016 to July 05, 2016, to
26 attend his best friend's wedding. CR # 43.

27 2. On May 16, 2016, Mr. Gallagher provided the government with his travel itinerary.

3. Upon receipt of Mr. Gallagher's travel itinerary, the government does not oppose
28 Mr. Gallagher's request to modify his travel conditions to allow him to travel to Puerto-Peñasco,
29 Mexico on the dates as listed above.

4. Based upon the government's non-opposition to Gallagher's Motion to Modify his

1 Pretrial Release Condition (CR # 43), the parties respectfully request that this Court amend Mr.
2 Gallagher's travel restriction to allow him to travel to Puerto-Peñasco, Mexico on the dates listed
3 above.

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5 DATED this 16th day of May, 2016.

6 RENE L. VALLADARES
7 Federal Public Defender

8 By: /s/ Monique Kirtley

9 MONIQUE KIRTLEY
10 Assistant Federal Public Defender
11 Attorney for Bryan James Gallagher

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15 **IT IS SO ORDERED.**

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17 **UNITED STATES MAGISTRATE JUDGE**

18 **DATED:** 5-16-2016

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on May 16, 2016, he served an electronic copy of the above and foregoing
UNOPPOSED MOTION TO MODIFY A CONDITION OF PRETRIAL RELEASE by
electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
PHILLIP N. SMITH JR.
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Christopher Vergari
Employee of the Federal Public Defender